

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION**

IN RE:

MELANIE RICE LAWS,

**CASE NO. 21-00711-5
CHAPTER 13**

DEBTOR

DEBTOR'S VERIFIED MOTION TO EXTEND AUTOMATIC STAY

Now comes the Debtor, by and through counsel, and moves this court to order, under 11 U.S.C. § 362(c)(3), that the full protections of the automatic stay be extended in this case until terminated under 11 U.S.C. § 362(c)(1) or (2), or until further order of the court. In support of this motion, the Debtor shows the court as follows:

1. The Debtor filed the above-captioned case on March 29, 2021.

1. On December 4, 2019, the Debtor filed a prior chapter 13 case bearing the assigned Case No. 19-05547-5-SWH in the Eastern District of North Carolina. The court dismissed that case on June 3, 2020. The dismissal of the prior case was because of the following (*mark all that apply*):

- ☒ Debtor or Debtor's immediate family incurred significant medical expenses;
- ☒ Debtor lost job/ had hours reduced/had wages reduced;
- ☐ Debtor incurred a significant expense on primary residence;
- ☐ Debtor incurred a significant expense on primary vehicle;
- ☐ Debtor was owed money by a third party (such as child support, alimony, worker's compensation) and was not paid (*if so, list source of money **);
- ☐ Debtor incurred a significant expense related to a dependent (*if so, provide details*): *
- ☐ Other *

2. The Debtor's circumstances have substantially changed because (*mark all that apply*):

- ☒ Debtor now has new income in the form of additional work hours, an additional job, additional wages from previous job, and/or a new job. Provide details:
*Debtor has a new job with better pay.
- ☐ Debtor now has new income in the form of monetary assistance from a third party individual (*provide details*): *
- ☐ Debtor now has new income in the form of monetary assistance from a third party organization (*provide details*): *

- ☐ Debtor now has more available income in the form of reduced expenses (*provide details*): *
- ☐ Other: *

3. As required by E.D.N.C. LBR 4001-1 (d)(1), this motion (*mark appropriate box*)

- ☒ is filed within five (5) days of the petition date
- ☐ is NOT filed within five (5) days of the petition date.

4. The Debtor has demonstrated by clear and convincing evidence that the current case is filed in good faith. The Debtor's circumstances have substantially changed so that the reason for dismissal in the prior case is not likely to recur and this case can be completed.

Wherefore, the Debtor prays for the court to enter an order extending the automatic stay as to all creditors until it would terminate under 11 U.S.C. §§ 362(c)(1) or (2), or until further order of the court, and for such further relief as the court deems just and appropriate.

Dated: April 2, 2021



/s/Travis Sasser

Travis Sasser
Attorney for Debtor
Sasser Law Firm
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Cary, NC 27518
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DECLARATION

Under penalty of perjury, I, **Melanie Rice Laws**, hereby certify that I have personal knowledge of all the information contained in the pleading above and all information is true and accurate, to the best of my knowledge.

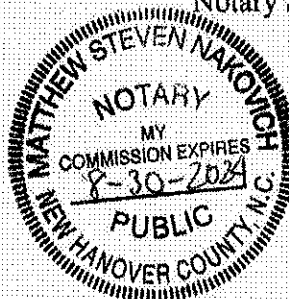
Melanie Rice Laws
(Signed)

Melanie Rice Laws,

Sworn and subscribed to me this the 2nd day of April, 2021

Matthew Steven Nakovich
Notary Public

Notary Seal



END OF DOCUMENT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION

IN RE:

MELANIE RICE LAWS,

DEBTOR

CASE NO. 21-00711-5
CHAPTER 13

NOTICE OF MOTION

NOTICE IS HEREBY GIVEN that a Motion to Continue Automatic Stay has been filed by the debtor. A copy of the motion accompanies this notice.

TAKE NOTICE FURTHER that pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of North Carolina, you have fourteen (14) days from the date of this Notice of Motion to file a responsive pleading to the attached Motion. If a response is filed, a hearing on this motion will be heard at the United States Bankruptcy Court, Eastern District of North Carolina, Raleigh Division located at the Century Station Federal Building, 300 Fayetteville Street, Raleigh, North Carolina 27601 in ***the 2nd Floor Courtroom starting at 10:00am on April 21, 2021.*** You must file your response with the Clerk, United States Bankruptcy Court, Post Office Box 791, Raleigh, NC 27602 with a copy to the undersigned. Any such responsive pleading must contain a request for a hearing if, indeed, you wish to be heard by the Court. Unless a hearing is specifically requested in a responsive pleading, the attached Motion may be determined and final Orders entered by the court without a hearing.

Dated: April 2, 2021



/s/ Travis Sasser

Travis Sasser

Attorney for Debtor

State Bar No. 26707

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Cary, NC 27518

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travis@sasserbankruptcy.com

CERTIFICATE OF SERVICE

The foregoing debtor's Motion to be served on the following parties, by mailing a copy by depositing it in the United States Mail, by First Class Mail, in a properly addressed envelope with adequate postage thereon.

ALL PARTIES ON THE ATTACHED MAILING MATRIX

Dated: April 2, 2021



/s/ Travis Sasser

Travis Sasser

Attorney for Debtor

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American Infosource LP
Attn: Managing Agent
PO Box 248848
Oklahoma City, OK 73124-8848

Blue Atlantic Mangement LLC
Attn: Managing Agent
5129 Oleander Dr # 101
Wilmington, NC 28403-7062

Carrington Mortgage Services, LLC
Attn: Managing Agent/Bankruptcy
1600 South Douglas Rd Ste 110/200A
Anaheim, CA 92806-5951

(p)DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
GREENWOOD VILLAGE CO 80155-6550

I.C. System, Inc
Attn: Managing Agent/Bankruptcy
444 Highway 96 East, PO Box 64437
Saint Paul, MN 55164-0437

Internal Revenue Service
Attn: Managing Agent
P. O. Box 7346
Philadelphia, PA 19101-7346

Jeremy S. Pepper, PA-C
1606 Wellington Ave
Wilmington, NC 28401-7747

NC Department of Revenue
Office Serv. Div., Bankruptcy Unit
Post Office Box 1168
Raleigh, NC 27602-1168

NC Housing Finance Agency
Attn: Managing Agent/Bankruptcy
3508 Bush Street
Raleigh, NC 27609-7509

New Hanover County
Tax Department, Collections
230 Market Place Drive, Suite 190
Wilmington, NC 28403-1672

North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, NC 27609-7509

SunTrust Bank, Inc.
Attn: Managing Officer
PO Box 85092
Richmond, VA 23285-5092

Suntrust Mortgage, Inc.
Bankruptcy Department RVW 3034
PO Box 27767
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Truist Bank
Attn: Managing Agent/Bankruptcy
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Richmond, VA 23261

Trustee Services of Carolina, LLC
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